

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Expanding Flexible Use of the 3.7 to 4.2)	GN Docket No. 18-122
GHz Band)	

ACCELERATED RELOCATION ELECTION OF INTELSAT LICENSE LLC

Intelsat License LLC (“Intelsat”)¹ submits this Accelerated Relocation Election pursuant to 47 C.F.R. § 27.1412(c), the Federal Communications Commission’s (the “Commission”) March 3, 2020 Report and Order, and the Wireless Telecommunications Bureau’s May 11, 2020 Public Notice detailing the form of any Accelerated Relocation Election to be filed in this docket.² By making this filing, Intelsat is providing notice that it has elected to perform an accelerated relocation as defined in the Commission’s rules or as modified on reconsideration.³ Intelsat understands and, as appropriate based on context, either commits to accept, or accepts, the obligations of making this election as reflected in the Commission’s Report and Order and as required in the Public Notice. Specifically:

1. Intelsat commits to paying the administrative costs of the Relocation Payment Clearinghouse until the Commission awards licenses to the winning bidders in the 3.7 GHz

¹ Intelsat License LLC, an FCC satellite licensee, and its affiliated entity Intelsat US LLC, which provides operational services to Intelsat License LLC, are collectively referred to in this Election as “Intelsat.”

² See Expanding Flexible Use of the 3.7 to 4.2 GHz Band, *Report and Order and Proposed Modification*, 35 FCC Rcd. 2343 (2020) [hereinafter “Report and Order”]; Wireless Telecommunications Bureau Announces the Process for Accelerated Relocation Elections by Eligible Space Station Operators in the 3.7-4.2 GHz Band, *Public Notice*, GN Docket No. 18-122, DA 20-503 (May 11, 2020) [hereinafter “Public Notice”].

³ Intelsat is contemporaneously filing a Petition for Reconsideration on several critically important technical and operational matters and requests that the Commission address these matters promptly, as they affect Intelsat’s continued ability to operate and to serve existing customers post-transition.

license auction, at which time Intelsat will be reimbursed for the administrative costs that it paid on an interim basis;⁴

2. Intelsat commits to relocating its own satellite services received in the contiguous United States out of the lower 300 MHz of the C-band by the Accelerated Relocation Deadlines (both Phase I and Phase II) and to taking responsibility for relocating its associated incumbent earth stations by those same deadlines;⁵

3. Intelsat commits to planning, coordinating, and performing (or contracting for the performance of) all the tasks necessary to migrate any incumbent earth station that receives signals from or sends signals to a space station owned by Intelsat, whether Intelsat is in direct privity of contract with the earth station operator or indirectly through another entity such as a programmer. Intelsat commits to providing a turnkey solution to the transition as to its customers and its associated incumbent earth stations;⁶

4. Intelsat commits to cooperating in good faith with the Relocation Coordinator and to paying all administrative costs of the Relocation Coordinator if the Relocation Coordinator is selected by the committee of electing space station operators;⁷

5. The undersigned, Secretary of Intelsat License LLC, and Executive Vice President, General Counsel and Chief Administrative Officer of Intelsat US LLC, is a company officer of both entities and has the authority to bind Intelsat to make this Accelerated Relocation Election.

⁴ See 47 C.F.R. § 27.1412(c)(2); Report and Order, para. 291.

⁵ Report and Order, para. 292. Intelsat notes that it is requesting reconsideration of the portion of the Report and Order rejecting Intelsat's continued, limited use of the lower 300 MHz at its two remotely-located consolidated TT&C/Gateway sites because, absent reversal of that rejection, Intelsat cannot ensure service continuity on a protected basis to all its existing customers.

⁶ See *id.*, para. 292. Earth stations that elect to opt out of having Intelsat handle their transition, as contemplated by the Report and Order, are not covered by this commitment. See *id.*, para. 293.

⁷ See *id.*, paras. 308, 314.

6. Intelsat acknowledges that unless it has received a waiver from the Commission, that the reductions in acceleration payments contained in the Report and Order and in the Commission's rules will apply in the event that Intelsat fails to complete the transition it has undertaken within each of the Accelerated Relocation Deadlines;⁸

7. Intelsat acknowledges that the Commission has the authority to adopt the accelerated relocation payment provisions, including the reductions in acceleration payments for missing deadlines;⁹ and

8. Intelsat acknowledges that sufficient eligible space station operators must elect accelerated relocation such that at least 80% of the total possible accelerated relocation payments are accepted for the Commission to accept elections from eligible space station operators and require overlay licensees to pay the accelerated relocation payments specified in the Report and Order and the Commission's rules.¹⁰

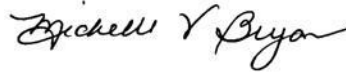
⁸ *See id.*, para. 297. In its Petition for Reconsideration, Intelsat urges the Commission to specify that in light of the ongoing global pandemic and the potential for unplanned labor stoppages, supply chain or other delays that will be outside of the satellite operators' control, waivers can be filed and will be considered on their merits.

⁹ *See id.*, paras. 27, 124-29, 147, 179-84.

¹⁰ *See id.*, para. 290.

Assuming that the Commission receives the requisite 80% of total possible acceleration relocation payments and requires future overlay licensees to pay for accelerated relocation, Intelsat has elected, and is prepared, to undertake the accelerated relocation process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michelle V. Bryan", written over a horizontal line.

Intelsat License LLC

Michelle V. Bryan

Secretary, Intelsat License LLC, and

Executive Vice President, General Counsel and

Chief Administrative Officer, Intelsat US LLC

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May 26, 2020